International Paper Corporation	**)**	**Departmental**
Androscoggin County	**)**	**Findings of Fact and Order**
Auburn, Maine	**)**	**Air Emission License**
A-461-71-D-T/R	**)**	

After review of the air emissions license renewal/transfer application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

International Paper Corporation (IP) of Auburn, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their corrugated container manufacturing facility.

B. License Transfer

1. IP has requested the transfer of Air Emission License A-461-74-B-R from Union Camp Corporation to International Paper Corporation through a license transfer application dated September 27, 1999. The facility is a corrugated container manufacturer. Air Emission License A-461-74-B-R was issued on September 19, 1994.

2. The full name and address of the new owner is:

   International Paper Corporation
   1 Allied Road
   P.O. Box 238
   Auburn, ME 04210

   The official date for the merger was May 1, 1999 and IP has assumed all obligations of the facility. A copy of the transaction was submitted to the Bureau of Air Quality on September 27, 1999.

3. IP certifies that there will be no increase in air emissions beyond that provided for in the existing license, either in quantity or type.

4. IP states that they possess the technical and financial capacity to operate the facility. The existing staff has been maintained throughout the merger. Thus,

the applicant feels confident that there is sufficient expertise in running the plant so as to operate completely within compliance of the license.

C. Emission Equipment

IP is authorized to operate the following equipment:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % sulfur	Stack #
Boiler #1	10.46	69.7	#6 fuel oil, 1.5%	1
Boiler #2	16.74	111.6	#6 fuel oil, 1.5%, or natural gas	2

D. Application Classification

The application for IP does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units in addition to the license transfer.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

Process Description

IP manufactures corrugated sheets and, in addition, forms them into folded box containers. The unbleached paper is shipped to the Auburn facility in roll form and then fed into IP's single corrugated machine. First, a single sheet is pressed and through steam heated rolls forming an accordion-like structure. The

accordion structure is then glued between two outer sheets. The final corrugated sheet may also be formed in two layers for a stronger product.

The final corrugated sheet is then trimmed and stacked. The sheets are fed into various machines depending on the customer order to form a folded box. In the process of folding the boxes, a small quantity of glue is applied and the box is also printed with the customer designs.

B. Boilers

IP operates Boiler #1 primarily for facility hot water and heating needs. Boiler #1 has a maximum heat capacity of 10.46 MMBtu/hr firing #6 fuel oil, with a maximum sulfur content not to exceed 1.5% by weight. Boiler #1 is a Cleaver Brooks Boiler manufactured in 1974 and is therefore not subject to EPA New Source Performance Standards (NSPS) 40CFR Part 60, Subpart Dc, for boilers with a heat input of 10 MMBtu/hr or greater and manufactured after June 9, 1989.

IP operates Boiler #2 primarily as a high-pressure steam boiler for the cardboard corrugating system. Boiler #2 has a maximum design heat input capacity of 16.74 MMBtu/hr firing #6 fuel oil, with a maximum sulfur content not to exceed 1.5% by weight. Natural gas may also be fired in this unit. Boiler #2 is also a Cleaver Brooks Boiler manufactured in 1974 and is therefore not subject to EPA New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, for boilers with a heat input of 10 MMBTU/hr or greater, and manufactured after June 9, 1989.

Based on the relatively small size of Boilers #1 and #2, and the quantity of pollutants that could potentially be emitted per boiler, it is determined by the Bureau of Air Quality that any add on pollution control device would be economically unjustified. Therefore, BPT for Boilers #1 and #2 shall be the firing of #6 fuel oil, with a maximum sulfur content not to exceed 1.5% by weight. Up to 500 gallons per year of specification waste oil and up to 500 gallons per year of mineral spirits may also be fired in Boilers #1 and #2.

The regulated pollutants emitted from Boilers #1 and #2 are particulate matter (PM), particulate matter with a diameter smaller than ten microns (PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NO_X), carbon monoxide (CO), and volatile organic compounds (VOC).

1. Emission rates for PM and PM_{10} for Boilers #1 and #2 are based upon MEDEP Chapter 103.

2. Emission rates for SO_2, NO_X, CO and VOC for Boilers #1 and #2 are based upon AP-42 data dated 9/98 for fuel oil combustion in boilers rated less than 100 MMBtu/hr.

3. Opacity from Boilers #1 and #2 while firing #6 fuel oil shall each not exceed 30% opacity on a six-minute block average basis, except for no more than 2 six-minute block averages in a 3 hour period.

4. Opacity from Boiler #2 while firing natural gas shall not exceed 10% opacity on a six-minute block average basis.

C. Process Emission Sources

1. As the boxes are trimmed to product specifications, the reject and scrap pieces of corrugated cardboard are collected pneumatically. The rejected corrugated pieces are separated from the air system by a cyclonic separator, which is vented through stack #3.

2. The glue that is used in the corrugating formation process is a water based corn starch mixture. Emissions are considered to be negligible and are therefore noted for inventory purposes only.

3. The ink applied to the finished boxes is primarily a water based ink with small quantities of isopropyl alcohol and/or monoethanolamine. Assuming a maximum total use of 30,000 gallons per year of ink from the above printing operations (with a maximum content of 0.74 lb VOC/gal) and assuming all of the volatile components in the inks are emitted as VOC vapor, IP shall not emit more than 11.1 tons/year of VOC emissions from the printing process.

4. The glue that is applied in the fold and gluing process of the corrugated boxes is primarily a water based glue with small quantities of vinyl acetate (<1% by weight). Assuming a maximum total use of 20,000 gallons per year of glue from the above folding operations (with a maximum content of 0.5 lb VOC/gal) and assuming all of the volatile components in the glue is emitted as VOC vapor, IP shall not emit more than 5.0 tons/year of VOC emissions from the folding process.

5. In addition, IP operates a parts cleaning station, utilizing mineral spirits. Assuming a maximum total use of 500 gallons per year of mineral spirits from the parts cleaning station (with a maximum content of 7 lb VOC/gallon) and assuming all of the volatile organic components in the mineral spirits is emitted as VOC vapor, IP shall not emit more than 1.8 tons/year of VOC emissions from the parts cleaning station. MEDEP Chapter 130 is applicable, and IP shall meet the regulations set forth in Chapter 130. This includes, but

is not limited to, proper labeling, keeping covers closed when not in use, and the exclusion of degreasing porous or absorbent materials.

D. Annual Emission Restrictions

Boilers #1 and #2 shall each not exceed the following emission limits, based on the combined total firing of 400,000 gallons per year (12 month rolling total) of #6 fuel oil with a maximum sulfur content of 1.5% by weight, and 100 MMscf of natural gas in Boiler #2 on a 12-month rolling total.

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

Pollutant	**Tons/Year**
PM	6.0
PM_{10}	6.0
SO_2	47.1
NO_x	11.0
CO	6.9
VOC	17.9

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Based on the total facility emissions, IP is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.
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Based on the above, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission License A-461-74-B-R, from Union Camp to IP, subject to all conditions attached to them.

The Department hereby grants Air Emission License A-461-71-D-T/R subject to the following conditions:

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions.

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. § 353.

(6) The license does not convey any property rights of any sort, or any exclusive privilege.

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or

b. pursuant to any other requirement of this license to perform stack testing.

(ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(iii) submit a written report to the Department within thirty (30) days from date of test completion.

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

(i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the

satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

SPECIFIC CONDITIONS

(16) Boilers #1 shall not exceed a heat input rate of 10.46 MMBtu/hr firing #6 fuel oil with a maximum sulfur content of 1.5% by weight. Boiler #2 shall not exceed a heat input rate of 16.74 MMBtu/hr firing natural gas or #6 fuel oil with a maximum sulfur content not to exceed 1.5% by weight.

(17) Boilers #1 and #2 shall each not exceed the following emission limits, based on the firing of 400,000 gallons per year of #6 fuel oil with a maximum sulfur content of 1.5% and 100 MMscf per year of natural gas on a 12-month rolling total.

Equipment		**PM**	**PM_{10}**	**SO_2**	**NO_x**	**CO**	**VOC**
Boiler #1	lb/MMBtu	0.2	0.2	-	-	-	-
	lb/hr	2.1	2.1	16.4	3.9	0.35	0.06
Boiler #2	lb/MMBtu	0.2	0.2	-	-	-	-
	lb/hr	3.3	3.3	26.3	6.2	1.2	0.09

(18) Visible emissions from Boilers #1 and #2 while firing #6 fuel oil shall each not exceed 30% opacity on a six-minute block average basis, except for no more than 2 six-minute block averages in a 3 hour period.

(19) Visible emissions from Boiler #2 while firing natural gas shall not exceed 10% on a six-minute block average basis.

(20) IP shall not exceed a total facility fuel use limit of 400,000 gallons per year including specification waste oil and mineral spirits (12-month rolling total) of #6 fuel oil with a maximum sulfur content of 1.5% by weight, and 100 MMscf of natural gas per year (12-month rolling total).

(21) IP shall maintain fuel use records on a monthly basis, in addition to a 12-month rolling total basis. IP shall maintain fuel receipts from the supplier documenting the sulfur content of the fuel oil.

(22) IP shall not emit more than 11.1 tons/year of VOC emissions from the printing process based on a 12-month rolling total.

(23) IP shall not emit more than 5.0 tons/year of VOC emissions from the fold and gluing process based on a 12-month rolling total.

(24) IP shall not emit more than 1.8 tons/year of VOC emissions from the parts cleaning station based on a 12-month rolling total.

(25) IP shall maintain the necessary records of quantity use and VOC content of the respective VOC containing material to demonstrate compliance with the VOC emission limits for the printing process, fold and gluing process, and the parts cleaning station (Conditions (22), (23) and (24)). Records shall be maintained on a monthly basis, in addition to a 12-month rolling basis.

(26) IP may burn up to 500 gallons per year of waste mineral spirits and up to 1000 gallons per year of specification waste oil in Boilers #1 and #2. The waste mineral spirits shall be non-hazardous and the waste oil shall be specification waste oil, as defined under the regulations of the Bureau of Remediation and

Waste Management. IP shall maintain a log quantifying the amount (on a monthly basis) of waste mineral spirits and specification waste oil that is fired in Boilers #1 and #2. The log shall be made available to the Department upon request. The additional gallons of mineral spirits and waste oil shall be included as part of the total facility fuel use limit of 400,000 gallons.

(27) In the event that natural gas is available to the facility, IP may burn natural gas in Boiler #1. IP shall notify the Bureau of Air Quality in writing within 5 days of any modifications to the boiler which allows for natural gas firing capacity.

(28) MEDEP Chapter 130 is applicable, and IP shall meet the regulations set forth in Chapter 130. This includes, but is not limited to, proper labeling, keeping covers closed when not in use, and the exclusion of degreasing porous or absorbent materials.

(29) The term of this Order shall be for five (5) years from the signature below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 28, 1999
Date of application acceptance: November 23, 1999

Date filed with the Board of Environmental Protection: _____

This Order prepared by Elisha McVay, Bureau of Air Quality.